

Jordan E. Tannenbaum
Vice Chairman

Reid J. Nelson
Executive Director, Acting



September 2, 2021

The Honorable Charles E. Schumer
Majority Leader
United States Senate
Capitol Building
Washington, DC 20510

The Honorable Mitch McConnell
Minority Leader
United States Senate
Capitol Building
Washington, DC 20510

Dear Leader Schumer and Leader McConnell:

As the vice chairman of the Advisory Council on Historic Preservation (ACHP) carrying out the responsibilities of the chairman during that position's current vacancy, and I am writing to urge as part of infrastructure legislation the inclusion of resources to support the development of GIS mapping and electronic records of historic properties at the state and tribal levels to better inform and facilitate the federal project planning process. Established by the National Historic Preservation Act of 1966 (NHPA), the ACHP is the independent federal agency charged with advising the President and Congress on matters relating to historic preservation. The following comments are offered for your consideration should a conference committee be convened to consider the Infrastructure Investment and Jobs Act (H.R. 3684) as well as during discussions on the budget reconciliation package currently under consideration.

Through the Section 106 review process established by the NHPA, federal agencies consider the effects of their projects, including those they carry out, approve, or fund, on historic properties and explore measures to avoid or reduce harm to such properties. Access to current, accurate digital information about where historic properties are located that can be appropriately shared greatly increases the efficiency and effectiveness of federal project planning for infrastructure and all other projects subject to review under Section 106. When federal agencies, along with their tribal, state, and local counterparts; project applicants; and consultants have ready access to data about the location and nature of historic properties, they can make project siting and design decisions that take historic properties into account earlier and more effectively.

Early access to this information can often lead to project designs that avoid impacts altogether, saving time and money that might otherwise be directed toward addressing avoidable harm to historic properties. When projects undergo required reviews, that data provides a common knowledge base for State Historic Preservation Offices (SHPOs) and federal agency officials in seeking information about whether historic properties could be affected by infrastructure construction. While most SHPOs, which are charged with maintaining a statewide inventory of historic properties by the NHPA, reported having some GIS capability in 2019 data from the National Conference of State Historic Preservation Officers, the accessibility and comprehensiveness of such systems was shown to vary widely. Tribal Historic Preservation Offices (THPOs), which carry out many NHPA duties on tribal land and also advise and assist federal agencies reviewing projects off tribal land, have similar challenges in developing GIS and digital databases for their own use.

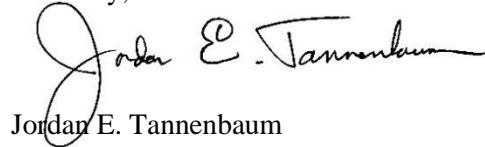
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The importance of digital tools to federal historic preservation reviews led the ACHP to establish a Digital Information Task Force, which I chaired, in 2018. Its report and [action plan](#) highlight the roles of states and Indian tribes as managers of historic properties data and the benefits of making data (for which location information can be appropriately shared) available to project planners as well as federal agencies with permitting and other review responsibilities for federally assisted infrastructure projects. While some SHPOs have been able to use a combination of federal, state, and private monies over a period of many years to establish basic GIS, there has never been a focused effort by the federal government to invest in making these systems more consistent and the information they contain more readily available to inform federal project planning. Dedicated resources to support state and tribal GIS and digital database development and expansion could advance these goals and, as a result, significantly improve federal planning and review efficiency. Nowhere is the need for and benefit of such systems more apparent than in the development of infrastructure, and particularly regarding multi-state energy transmission, telecommunications, and transportation projects, along with other components of the infrastructure bill.

As federal agencies prepare for the increase in consultations they must carry out with states, tribes, Native Hawaiian organizations and other community stakeholders to consider the effects of federally permitted or assisted infrastructure projects on historic properties, these tools can help speed project delivery while taking into account our nation's diverse historic resources. We therefore urge the inclusion of investments in these important tools, both for the benefit of advancing our collective infrastructure goals and for the long-term management and protection of historic properties that can and should exist in productive harmony with this development. Should you have any questions regarding this issue, please feel free to contact me or Reid Nelson, Acting Executive Director, at rnelson@achp.gov.

Sincerely,

A handwritten signature in black ink, reading "Jordan E. Tannenbaum". The signature is fluid and cursive, with the first name "Jordan" being the most prominent.

Jordan E. Tannenbaum
Vice Chairman